

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC., a California
Corporation,

Plaintiff and
Counterclaim-Defendant,

v.

INTERNET SECURITY SYSTEMS, INC.,
a Delaware corporation, INTERNET
SECURITY SYSTEMS, INC., a Georgia
corporation, and SYMANTEC
CORPORATION, a Delaware corporation,

Defendants and
Counterclaim-Plaintiffs.

C. A. No. 04-1199 (SLR)

PUBLIC VERSION

**DECLARATION OF KYLE WAGNER COMPTON IN SUPPORT OF
SRI INTERNATIONAL, INC.'S RESPONSE TO DEFENDANT ISS'S
MOTION FOR SUMMARY JUDGMENT THAT THE ASSERTED
CLAIMS OF THE SRI PATENTS-IN-SUIT ARE NOT INFRINGED
OR, IN THE ALTERNATIVE, ARE INVALID**

I, Kyle Wagner Compton, declare as follows:

I am an Associate with Fish & Richardson P.C., counsel for Plaintiff SRI International, Inc. ("SRI"). I make the following statements based on personal knowledge.

1. Attached hereto as Exhibit A is a true and correct copy of a presentation, *Fusion Update*, dated August 9, 2002, bearing production numbers ISS_60287-60300.
2. Attached hereto as Exhibit B is a true and correct copy of excerpts from the deposition transcript of Paul Elliot Griswold taken April 19, 2006.
3. Attached hereto as Exhibit C is a true and correct copy of the Expert Report of Dr. George Kesidis on Infringement dated April 28, 2006.
4. Attached hereto as Exhibit D is a true and correct copy of Exhibit C to the Expert Report of Dr. George Kesidis on Infringement dated April 28, 2006, a claim chart for U.S. Patent 6,711,615.

5. Attached hereto as Exhibit E is a true and correct copy of the Rebuttal Expert Report of Steven A. Smaha, dated May 16, 2006.
6. Attached hereto as Exhibit F is a true and correct copy of the Rebuttal Report of Dr. George Kesidis on Validity dated May 16, 2006.
7. Attached hereto as Exhibit G is a true and correct copy of excerpts from the deposition transcript of Joseph John Kleinwaechter, taken April 18, 2006.
8. Attached hereto as Exhibit H is a true and correct copy of excerpts from the deposition transcript of James Donald Innes, taken April 13, 2006.
9. Attached hereto as Exhibit I is a true and correct copy of excerpts from the deposition transcript of Robert Ferrill, taken April 19, 2006.
10. Attached hereto as Exhibit J is a true and correct copy of excerpts from deposition transcript of Brenda Jean Roberts, taken April 20, 2006.
11. Attached hereto as Exhibit K is a true and correct copy of Internet Security Systems' *Site Protector SecurityFusion Module Guide – Version 2.0*, dated March 8, 2006.
12. Attached hereto as Exhibit L is a true and correct copy of excerpts from the deposition transcript of Raymond Gazaway, taken April 12, 2006.
13. Attached hereto as Exhibit M is a true and correct copy of Internet Security Systems' *Proventia Network Anomaly Detection System (ADS) Quick Start Guide – Version 3.5*, dated March 10, 2006, bearing the production numbers ARB-00693-00740.
14. Attached hereto as Exhibit N is a true and correct copy of Internet Security Systems' *Proventia Network Anomaly Detection System (ADS) Quick Start Guide – Version 3.5*, dated March 17, 2006.
15. Attached hereto as Exhibit O is a true and correct copy of Exhibit D to the Expert Report of Dr. George Kesidis on Infringement dated April 28, 2006, a claim chart for U.S. Patent 6,484,203.

16. Attached hereto as Exhibit P is a true and correct copy of excerpts from the deposition transcript of Jim Pruss, taken March 23, 2006.

17. Attached hereto as Exhibit Q is a true and correct copy of *Security Fusion Module 2.0 Tech Support Chalk Talk* bearing production numbers ISS_00535783-00535821.

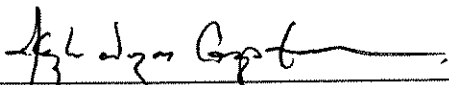
18. Attached hereto as Exhibit R is a true and correct copy of the website http://www.iss.net/education/schedules/by-courses/by_course-course=94-region=north-america.php.

19. Attached hereto as Exhibit S is a true and correct copy of the Expert Report of Stuart Staniford, dated April 21, 2006.

20. Attached hereto as Exhibit T is a true and correct copy of excerpts from the deposition transcript of Dr. George Kesidis, taken May 26, 2006.

21. Attached hereto as Exhibit U is a true and correct copy of excerpts from the deposition transcript of Bernard Paul Palmer, Jr., taken April 17, 2006.

I declare under penalty of perjury under that the foregoing is true and correct.
Executed this 30th day of June 2006, in Wilmington, Delaware.



Kyle Wagner Compton

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2006, I electronically filed the **REDACTED –
DECLARATION OF KYLE WAGNER COMPTON IN SUPPORT OF SRI
INTERNATIONAL, INC.’S RESPONSE TO DEFENDANT ISS’S MOTION FOR
SUMMARY JUDGMENT THAT THE ASSERTED CLAIMS OF THE SRI
PATENTS-IN-SUIT ARE NOT INFRINGED OR, IN THE ALTERNATIVE, ARE
INVALID** with the Clerk of Court the attached document using CM/ECF which will send
electronic notification of such filing(s) to the following Delaware counsel.

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/s/ John F. Horvath
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